## EXHIBIT B

Redline of Proposed Order against Proposed Order filed with Objection

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11

Gawker Media LLC, et al.,<sup>1</sup> : Case No. 16-11700 (SMB)

Debtors. : (Jointly Administered)

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## ORDER GRANTING DEBTORS' OBJECTION TO THE CLAIMS OF ALADAR BALDAUF (CLAIM NOS. 326 AND 332)

Upon the objection (the "Objection")<sup>2</sup> of the above-caption debtors (collectively, the "Debtors"), for entry of an order (this "Order") disallowing and expunging the claims set forth on Schedule 1 attached hereto (the "Claims"); and upon the Holden Declaration; and upon the Declaration of Gregg M. Galardi Submitting Certain Documentation Received from Aladar Baldauf [Docket No. 859] (the "Galardi Declaration"); and the Court having found that it has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that venue of this proceeding and the Objection is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and upon consideration of

<sup>&</sup>lt;sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

- 1. The relief requested in the Objection is granted to the extent provided herein.
- 2. Pursuant to section 502(b) of the Bankruptcy Code, the Claims are hereby disallowed and expunged in their entirety for the reasons set forth in the Objection.
- 3. Prime Clerk LLC, the Debtors' claims and noticing agent, is authorized to cause the Claims Register to be amended to reflect the terms of this Order.
- 4. The disallowance and expunging of the Claims shall not create, and is not intended to create, any rights in favor of, or enhance the status of, any claim held by any person or entity.
- 5. Entry of this Order is without prejudice to the Debtors' right to object to any other claims in these chapter 11 cases or to further object to the Claims (to the extent the Claims are not disallowed and expunged pursuant to this Order) on any grounds whatsoever, at a later date.
- 6. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of any claim not listed on Schedule 1 annexed to this Order, and

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the Debtors' and any party in interest's rights to object on any basis is expressly reserved with

respect to any such claim not listed on Schedule 1 annexed hereto.

7. Notice of the Objection, as provided therein, shall be deemed good and

sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a), the Case

Management Procedures entered on July 13, 2016 [Docket No. 93], and the Local Bankruptcy

Rules of this Court are satisfied by such notice.

8. The terms and conditions of this Order shall be immediately effective and

enforceable upon its entry.

9. The Debtors are authorized and empowered to take all actions as may be

necessary and appropriate to implement the terms of this Order.

10. This Order shall be a final order with respect to the Claims.

11. This Court shall retain jurisdiction to hear and determine all matters

arising from or related to this Order.

Dated:, 2017	
New York, New York	
	THE HONORABLE STUART M. BERNSTEIN
	UNITED STATES BANKRUPTCY JUDGE

## Schedule 1

NO.	CLAIMANT	CASE	DEBTOR	SCH	CLAIM	DATE	CLAIM	OBJECTION PAGE
		NUMBER	NAME	NO.	NO.	FILED	AMOUNT	NO. REFERENCE
1	Baldauf, Aladar	16-11718	Gawker Hungary	N/A	326	11/15/201	\$35,000.00	5
	Semmelweis utca 5.	(SMB)	Kft. (f/k/a Kinja			6		
	Budapest 1052		Kft.)					
	Hungary							
2	Baldauf, Aladar	16-11718	Gawker Hungary	N/A	332	11/15/201	\$35,000.00	5
	Semmelweis utca 5.	(SMB)	Kft. (f/k/a Kinja			6		
	Budapest 1052		Kft.)					
	Hungary							